

**STATEMENT OF WORK FOR  
DR. L. V. URBAN FOR  
REVIEW OF THE U. S. DEPARTMENT OF ENERGY  
DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR  
A PROPOSED GEOLOGIC REPOSITORY FOR HIGH-LEVEL RADIOACTIVE WASTE  
AT YUCCA MOUNTAIN, NEVADA**

**BACKGROUND:**

The U.S. Department of Energy (DOE) has prepared a draft environmental impact statement (DEIS) for a proposed geologic repository for the disposal of high-level radioactive waste (HLW) at Yucca Mountain, Nevada. This DEIS will be submitted in support of any site recommendation report to the President that is required by law. The Nuclear Regulatory Commission (NRC) has special expertise related to radiological health and safety and has jurisdiction to license the construction, operation, and closure of such a repository. The NRC also has responsibility under the National Environmental Policy Act of 1969 (NEPA) to provide comments on the DEIS. Additionally, the Nuclear Waste Policy Act of 1982, as amended, requires NRC to provide sufficiency comments on the site recommendations to the President made by DOE.

DOE released the DEIS for public comment on August 5, 1999. The public comment period is scheduled to last 180 days. NRC will conduct a thorough review of the DEIS during this period, and the Center for Nuclear Waste Regulatory Analyses (CNWRA) will provide technical support in the review. The CNWRA requires consultant support from Dr. Urban for the DEIS.

**STATEMENT OF WORK:**

Dr. Urban is to conduct both a completeness review and an evaluative review of the DEIS.

The completeness review shall assess the comprehensiveness of the DEIS and the extent to which issues addressed in the DEIS have been properly integrated and coordinated. The evaluative review shall include an evaluation of supporting data, data-gathering methods, analysis methods, and any relevant supporting documents to determine whether the stated environmental impacts have been adequately supported. The evaluative review shall also include an assessment of potential environmental impacts and the proposed mitigation measures. Significant assumptions and areas of uncertainty that underlie the stated impact for the preferred and alternative disposal options should also be identified and evaluated. Dr. Urban should specifically comment on any areas of the DEIS that, in his experience, would likely be at issue during the judicial review process.

If Dr. Urban identifies concerns regarding a predictive methodology used in the DEIS, an alternative preferred methodology should be described and a rationale for this preference should be provided. Any comments should be specific and should provide a path for resolution. The CNWRA will provide an example of an appropriate comment format.

The completeness review comments shall be submitted to CNWRA by August 20, 1999. These comments should include an identification of any required copyrighted references or areas requiring additional clarification.

The evaluative review comments are to be provided to the CNWRA by October 25, 1999.